

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)
)
John and Deanna Williams.,) BK case # 15-13717
) Chapter 11
Debtors.)

**OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY
AND NOTICE OF HEARING THEREON**

COMES NOW the debtors, John and Deanna Williams, by and through their attorney, and object to the Motion For Relief From Stay filed by the creditor CITIMortgage (doc#68), whose motion was filed on November 20th, 2015. In support of their objection, the debtors will show the court the following:

1. This case was commenced on September 29, 2015 by the filing of a voluntary petition under Chapter 13 of the Bankruptcy Code, §§ 101 et seq.

2. Although not specifically stated in the motion for relief filed by CITI Mortgage on November 20, (doc #68) The property at issue is located at 2122 Ray Ave, Oklahoma City, Ok 73121.

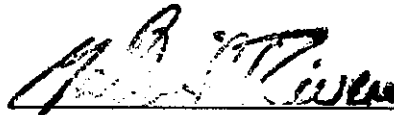
3. Prior to the filing of the instant motion, CITI Mortgage issued to Debtors a RELEASE OF MORTGAGE which in effect, dispensed with any further mortgage payments and recognized Debtors to be the owners of the subject property. *See, attached exhibit "A"*.

WHEREFORE Debtors' pray that this Court deny the instant request for relief from the automatic stay.

Notice of Hearing

A hearing on CITI Mortgage Company's Motion For Relief From the Automatic Stay along with the debtors objection thereto will be held on the **8th day of December, 2015 at 2:00pm**, before the Honorable Janice Loyd, Second (2nd) Floor Courtroom, Old Post Office and Courthouse, 215 Dean A. McGee Oklahoma City, Oklahoma 73102.

Respectfully Submitted



Gabriel Rivera #14454
Rivera & Associates
PO Box 7837
Moore, OK 73153-1837
(405)237-3352
Attorney for Debtors

Certificate Of Service

This is to certify that on the 25th day of November 2015, a true and correct copy of the above objection was mailed, first class postage prepaid, to the party listed below:

Bret D. Davis OBA# 15079
Lamun Mock Cunnyingham & Davis, P.C.
5613 N. Classen Boulevard
Oklahoma City, OK 73118-1295
(405) 840-5900
Attorney for CITI Mortgage


Gabriel Rivera

Recording Requested By:
VERDUGO TRUSTEE SERVICE CORPORATION

When Recorded Return To:

m
ENV

DEANNA WILLIAMS
2122 RAY AVE.
OKLAHOMA CITY, OK 73121-1840



20150519010650360
05/19/2015 09:12:25 AM
Bk:RE12826 Pg:980 Pgs:1 RMTG
State of Oklahoma
County of Oklahoma
Oklahoma County Clerk
Carolynn Caudill

Release of Mortgage

CITIMORTGAGE, INC. #:1120374355 "WILLIAMS" Lender ID:275 Oklahoma, Oklahoma
KNOW ALL MEN BY THESE PRESENTS that CITIMORTGAGE, INC., SUCCESSOR IN INTEREST BY
MERGER TO CITIFINANCIAL MORTGAGE COMPANY INC. FORMERLY KNOWN AS ASSOCIATES
HOME EQUITY SERVICES, INC whose address is 14700 CITICORP DRIVE, MC 1020, HAGERSTOWN,
MD 21742 holder of a certain mortgage, whose parties, dates and recording information are below, does
cancel and discharge said mortgage.

Original Mortgagor: DEANNA L WILLIAMS AND JOHN WILLIAMS

Original Mortgagee: ASSOCIATES HOME EQUITY SERVICES, INC.

Dated: 12/09/2000 Recorded: 04/10/2002 in Book/Reel/Liber: 8405 Page/Folio: 234 as Instrument No.:
2002054552

In the records of the County Clerk of Oklahoma County, State of Oklahoma.

Legal: A PART OF THE NORTH HALF (N/2) OF BLOCK THREE (3) OF SUBURBAN ACRES ADDITION
TO OKLAHOMA CITY OKLAHOMA COUNTY OKLAHOMA BEGINNING AT THE NORTHWEST CORNER
OF SAID BLOCK THREE (3) THENCE EAST 165.5 FEET; THENCE SOUTH 136 FEET THENCE WEST
165.5 FEET; THENCE NORTH 136 FEET TO THE POINT OF BEGINNING.

Property Address: 2122 RAY AVE., OKLAHOMA CITY, OK 73121-1840

IN WITNESS WHEREOF, CITIMORTGAGE, INC., SUCCESSOR IN INTEREST BY MERGER TO
CITIFINANCIAL MORTGAGE COMPANY INC. FORMERLY KNOWN AS ASSOCIATES HOME EQUITY
SERVICES, INC by the officer duly authorized, has duly executed the foregoing instrument;

CITIMORTGAGE, INC., SUCCESSOR IN INTEREST BY MERGER TO CITIFINANCIAL MORTGAGE
COMPANY INC. FORMERLY KNOWN AS ASSOCIATES HOME EQUITY SERVICES, INC
On May 7th, 2015

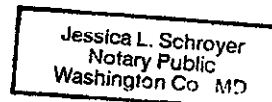
By: 
PATRICIA DEAN, Vice President

STATE OF Maryland
COUNTY OF Washington

On this 7th day of May 2015, before me, the undersigned officer personally appeared PATRICIA DEAN ,
who made acknowledgment on behalf of CITIMORTGAGE, INC., SUCCESSOR IN INTEREST BY
MERGER TO CITIFINANCIAL MORTGAGE COMPANY INC. FORMERLY KNOWN AS ASSOCIATES
HOME EQUITY SERVICES, INC, who acknowledges himself/herself to be the Vice President of
CITIMORTGAGE, INC., SUCCESSOR IN INTEREST BY MERGER TO CITIFINANCIAL MORTGAGE
COMPANY INC. FORMERLY KNOWN AS ASSOCIATES HOME EQUITY SERVICES, INC, a corporation,
and that he/she as such Vice President, being authorized so to do, executed the foregoing instrument for
the purposes therein contained, by signing the name of the corporation by himself/herself as Vice President

WITNESS my hand and official seal.

JESSICA L. SCHROYER
Notary Expires: 02/22/2017



(This area for notarial seal)